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Dory McMillan

Clark University, domcmillan@clarku.edu

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**The Impact of Special Interest Groups on the Federal Dietary Guidelines: Consequences
for American Health**

By Dory McMillan

School of Professional Studies, Clark University

Capstone Research Project

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Mary Piecewicz

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Table of Contents

Abstract.....	4
Introduction.....	5
Background.....	6
Dietary Guidelines for Americans.....	6
US Department of Health and Human Services.....	6
US Department of Agriculture.....	7
Special Interest Groups.....	8
Hypothesis.....	9
Methods.....	9
Findings.....	10
Dietary Guidelines vs. Scientific Report.....	10
Check Off Programs and the USDA.....	12
Conflicting Goals Within The USDA.....	13
The Food Industry, Special Interest Groups, and The USDA.....	14
The Food Industry, Special Interest Groups, and HHS.....	17
Health Implications of Red Meat Consumption.....	19
Healthcare Costs.....	21
Discussion.....	22
Conclusion.....	23

Abstract

This research paper explores the impact of relationships between lobbyists and both the USDA and HSS, and the impact these relationships have on the *Dietary Guidelines for Americans* that the agencies work together to create. The paper focuses specifically on the information the guidelines present in regard to red meat consumption, and the impacts this may have on American health, and healthcare costs associated. It was hypothesized that a relationship would be found between special interest groups and the U.S. Department of Health and Human Services and/or the U.S. Department of Agriculture. Research found there was a relationship between special interest groups and the USDA, but not between special interest groups and HSS. It was also hypothesized that one result of this relationship would be the absence of an explicit recommendation against red meat consumption in the published *Dietary Guidelines for Americans*. Research found that there was no recommendation against red meat consumption in the guidelines, but the impact of USDA and lobbyist relationships was not proven as a causal factor. Finally, it was hypothesized that the lack of a recommendation against red meat consumption would negatively impact the health of the American public at significant cost to the healthcare system, which research found to be true. This research is important because it demonstrates the ways in which American health is suffering, the impacts this has on healthcare expenditure, as well as the potential role the US government has in influencing American health either positively or negatively.

Keywords: special interest groups, lobbyists, red meat, health, healthcare costs, USDA, HSS, Dietary Guidelines for Americans

Introduction

The United States is one of the richest countries in the world, as well as one of the most highly developed. However, the United States is also below average in terms of the overall health of the nation, ranked as the 35th healthiest country in the world (Miller & Lu, 2019), and life expectancy, ranked 46th in the world (Worldometer, 2020). 70.1% of American adults are overweight or obese (Papanicolas et al., 2018), and this is largely due to the poor diet of many Americans. The United States federal government aims to guide and inform American dietary patterns through providing the public with dietary guidelines called, *Dietary Guidelines for Americans*. These guidelines outline which foods are healthy and which foods are not, as well as the quantities in which they should be eaten. The guidelines are produced by the U.S. Department of Health and Human Services as well as the U.S. Department of Agriculture. This begs the question, if there are guidelines that exist to inform American citizens on health dietary patterns and habits, why are Americans still so unhealthy? One possible explanation is that the information presented in these dietary guidelines does not accurately represent the scientific data that exists in regard to the healthfulness of certain foods, mainly red meat. Certain sources question whether the information presented in these guidelines has been impacted by special interest group and lobbyist relationships with the USDA and HHS (Heid, 2016). The purpose of this research paper is to explore the relationships between special interest groups and the USDA and/or HHS (if one exists), and the possible impacts these relationships have had on the information presented in the *Dietary Guidelines for Americans* regarding red meat consumption, and the impact on American's health and the healthcare costs associated.

Background

Dietary Guidelines for Americans

Every five years, the Federal government publishes a new edition of the *Dietary Guidelines for Americans*. This document is, “an essential resource for health professionals and policymakers as they design and implement food and nutrition programs that feed the American people..., and [it] also provides information that helps Americans make healthy choices for themselves and their families” (U.S. Department of Health and Human Services & U.S. Department of Agriculture, 2015). The guidelines are created and published by both the U.S. Department of Health and Human Services (HHS) and the U.S. Department of Agriculture (USDA). The content of the guidelines is based on a scientific report written by a federal advisory committee called the Dietary Guidelines Advisory Committee, which is made up of a variety of experts from the fields of nutrition, health, and medicine (U.S. Department of Health and Human Services & U.S. Department of Agriculture, 2015). Although the content of the guidelines is informed by this scientific report, HHS and the USDA have the final say in what information is or is not presented in the guidelines.

U.S. Department of Health and Human Services

The United States Department of Health and Human services (HHS) is a department within the executive branch of the federal government. Their mission is, “to enhance the health and well-being of all Americans, by providing for effective health and human services and by fostering sound, sustained advances in the sciences underlying medicine, public health, and social services” (U.S. Department of Health and Human Services, 2016). There are a variety of agencies that operate within HHS, including the Food and Drug Administration (FDA), the

Center for Disease Control (CDC), and the National Institutes of Health (NIH) to name a few (U.S. Department of Health and Human Services, 2016). HHS develops and works under a strategic plan which is updated every four years. This strategic plan outlines the organization's goals and issues they wish to address, as well as how they will go about reaching these goals over the next four years. Issues that are present in the 2018-2022 strategic plan are:

“Strategic Goal 1: Reform, Strengthen, and Modernize the Nation's Healthcare System, Strategic Goal 2: Protect the Health of Americans Where They Live, Learn, Work, and Play, Strategic Goal 3: Strengthen the Economic and Social Well-Being of Americans Across the Lifespan, Strategic Goal 4: Foster Sound, Sustained Advances in the Sciences, and Strategic Goal 5: Promote Effective and Efficient Management and Stewardship” (U.S. Department of Health and Human Services, 2019).

HHS works towards these goals through various different projects and initiatives, including the Dietary Guidelines for Americans.

U.S. Department of Agriculture

The U.S. Department of Agriculture (USDA), is also a department within the federal brand of the government similar to HHS. The goal of the USDA is to, “provide leadership on food, agriculture, natural resources, rural development, nutrition, and related issues based on public policy, the best available science, and effective management” (U.S. Department of Agriculture, n.d.). The USDA comprises 29 offices and agencies which work on a variety of issues including food safety, food and nutrition services, rural development, agricultural

research, and many more (U.S. Department of Agriculture, n.d.). Similarly to HHS, the USDA has a list of strategic goals that they are working towards between 2018 and 2022, these being:

1. “Ensure USDA programs are delivered efficiently, effectively, and with integrity and a focus on customer service.
2. Maximize the ability of American agricultural producers to prosper by feeding and clothing the world.
3. Promote American agricultural products and exports.
4. Facilitate rural prosperity and economic development.
5. Strengthen the stewardship of private lands through technology and research.
6. Foster productive and sustainable use of our National Forest System Lands.
7. Provide all Americans access to a safe, nutritious and secure food supply” (U.S. Department of Agriculture, n.d.).

The Dietary Guidelines for Americans are one part of strategic goal number seven, that the USDA develops in tandem with HHS.

Special Interest Groups

Special interest groups are groups of individuals or organizations with shared interests who form a group with the purpose of influencing public policy to support their shared interests (Thomas, 2017). Interest groups can be split into five categories, these being “economic interests, cause groups, public interests, private and public institutional interests, and non-associational groups and interests” (Thomas, 2017). The way that interest groups operate, is through lobbying, which can take place in a number of ways. Lobbying can include writing

letters to, or calling legislators and other public officials, organizing campaigns to influence public opinion on a certain issue, donating money to an election campaign, or simply giving public officials money or any other item or service of value to them (The Editors of Encyclopaedia Britannica, 2020). Lobbying is carried out by special interest groups in the hope that the targeted legislator will support their cause in the form of a vote in favor of their interest. There are many special interest groups such as the American Meat Institute, the National Meat Association, and the National Cattlemen's Beef Association that lobby legislators for the interests of those in the meat industry (Johnson, n.d.).

Hypothesis

I hypothesize that a relationship will be found between special interest groups and the U.S. Department of Health and Human Services and/or the U.S. Department of Agriculture. I also hypothesize that one result of this relationship will be the absence of an explicit recommendation against red meat consumption in the published *Dietary Guidelines for Americans*. Finally, I hypothesize that the lack of a recommendation against red meat consumption will negatively impact the health of the American public at significant cost to the healthcare system.

Methods

Secondary research was carried out using a variety of sources and databases. The books, *Meatonomics: How the Rigged Economics of Meat and Dairy Make You Consume Too Much and How to Eat Better, Live Longer, and Spend Smarter* by David Robinson Simon, and *Food Politics: How the Food Industry Influences Nutrition & Health* by Marion Nestle were used to

gather information to inform a variety of sections of this paper. Additionally, the full documents of the *2015–2020 Dietary Guidelines for Americans*, as well as the *Scientific Report of the 2015 Dietary Guidelines Advisory Committee* were referenced a great deal. The websites of the United States Department of Health and Human Services, and the United States Department of Agriculture were also important sources for this paper. Finally, a variety of other articles were used to provide background on some important topics and gather a variety of expert viewpoints on the issues this paper explored.

Findings

Dietary Guidelines vs. Scientific Report

In line with the *Dietary Guidelines for Americans* which is updated and published every 5 years, the Dietary Guidelines Advisory Committee (DGAC) writes an updated scientific report every five years as well, to be referenced when writing the guidelines. Through in-depth research and literature review, the Scientific Report of the 2015 Dietary Guidelines Advisory Committee identified various recommended dietary changes that would improve the health of the American people. These included recommending an increased intake of vegetables, fruits, whole grains, low or nonfat dairy, seafood, legumes, and nuts, and decreased intake of red and processed meat, foods high in sugar, sugary drinks, and refined grains (US Department of Health and Human Services/Department of Agriculture, 2015). Additionally, the scientific report stated that there was “moderate to strong evidence [that] higher intake of red and processed meats was identified as detrimental compared to lower intake” (US Department of Health and Human Services/Department of Agriculture, 2015, Pg. 3). The scientific report is direct and clear about

the evidence that exists demonstrating the detrimental effects of red meat intake, and their recommendation that intake be limited based on this clear evidence.

The *Dietary Guidelines for Americans* are significantly less clear in their presentation of scientific evidence and their resulting recommendations. It is important to note that the guidelines take on numerous different forms and inform a variety of subsequent documents. Firstly, there are the full published guidelines which can be found online and are 122 pages long, containing detailed information. Within the full guidelines is a “key recommendations” page which sums up the foods that are considered healthy, and foods that should be limited based on the guideline’s recommendations. Foods listed as healthy are, vegetables, fruit, whole grains, fat-free or low-fat dairy, protein foods including seafood, lean meats, poultry, eggs, legumes, nuts, seeds, soy products, and oils (US Department of Health and Human Services/Department of Agriculture, 2015). Foods that should be limited include, “saturated fats and *trans* fats, added sugars, and sodium (US Department of Health and Human Services/Department of Agriculture, 2015, Pg, 15). However, the guidelines go into much more detail in further sections, some of which contradicts the recommendations presented on the “key recommendations page”.

In the “About Meats & Poultry” section, the guidelines read, “Strong evidence has shown that *eating patterns* that include lower intake of meats as well as processed meats and processed poultry are associated with reduced risk of CVD [cardiovascular disease] in adults. Moderate evidence indicates that these *eating patterns are* associated with reduced risk of obesity, type 2 diabetes, and some types of cancer in adults” (US Department of Health and Human Services/Department of Agriculture, 2015, Pg., 25). Here “meat” is defined as, “all forms of beef, pork, lamb, veal, goat, and non- bird game (e.g., venison, bison, and elk)” (US Department of Health and Human Services/Department of Agriculture, 2015, Pg., 25). According to the

Dietary Guidelines for Americans criteria, “strong evidence reflects a large, high-quality, and/or consistent body of evidence... [and] moderate evidence reflects sufficient evidence to draw conclusions” (US Department of Health and Human Services/Department of Agriculture, 2015, Pg. 9).

Despite this strong evidence presented in both the scientific report, as well as the dietary guidelines itself about the harmful effects of red meat intake, the guidelines still list meat as a healthy food, and suggest 26 oz a week of meat, poultry, and eggs be consumed by Americans (US Department of Health and Human Services/Department of Agriculture, 2015, Pg., 25). These contradictions between the reported scientific evidence, and the resulting recommendations leave many questions unanswered about what is truly informing or impacting the content of the *Dietary Guidelines for Americans*.

Check Off Programs and the USDA

The book *Meatonomics*, by David Robinson Simon explores the relationship between the meat industry and the American government, and certain policies that exist that impact this relationship. One such policy is called, “checkoff programs”, described by Simon as “government mandated marketing” (Simon, 2013, Pg. 4). Checkoff programs are overseen by the USDA, and operate under the goal of promoting certain commodities, such as soy, eggs, beef, cotton, dairy, pork, potatoes, and more (*Checkoff Programs - An Overview*, n.d.). The way checkoff programs work is the government collects taxes from farmers within these industries, and uses this money for research, and promotion of the commodities listed above (*Checkoff Programs - An Overview*, n.d.). For example, a cattle rancher will be taxed a certain amount by the government based on the number of cattle he has, and the money the government receives

from him, and all the other cattle ranchers is used to advertise and promote beef consumption, and industry research. The cattle ranchers do not have a say in the content or nature of the advertisements and promotion, the government has full control over this. Certain parties within industries that operate under checkoff programs have argued that the programs violate their first amendment right, and are thus unconstitutional, but the U.S. Supreme Court has not yet ruled in their favor, citing government speech as the reason why (*Checkoff Programs - An Overview*, n.d.). Government speech is the right our government has to say what they want, and express whichever viewpoint they wish to express (*The Government Speech Doctrine*, n.d.). In regard to checkoff program government funded ads, the government has the right to decide the viewpoint and content presented because of government speech.

Conflicting Goals Within The USDA

Research has shown that conflicting goals exist within the USDA which could contribute to the absence of an explicit recommendation against red meat consumption in the published *Dietary Guidelines for Americans*. As mentioned earlier, the USDA oversees checkoff programs which work to increase the research on, and promotion of certain commodities, including red meat. Each year these checkoff programs spend \$557 million dollars promoting and researching animal food products (Simon, 2013). David Simon, author of *Meatonomics* writes, “If the USDA disengaged from checkoffs that promote animal foods, it would significantly reduce the nation's routine overconsumption of these foods” (Simon, 2013, Pg. 18). The USDA actively works to promote foods including red meat with the goal of increasing consumption, while simultaneously being responsible (along with HHS) for producing the federal nutritional guidelines.

Priorities of the USDA have been called into question in the past by those questioning if a single agency should be tasked with both creating nutritional guidelines, as well as the promotion and subsidization of a variety of food products (Simon, 2013, Heid, 2016). These two responsibilities inherently contradict one another and complicate the agency's ability to carry out both responsibilities in an unbiased and conflict free manner.

The Food Industry, Special Interest Groups, and the USDA

Over the years, there have been a variety of instances in which the USDA's relationship with those in the food industry has been questionable. For example, "by the end of WWII, a period during which government and food producers worked together in the national interest, farmers and food producers began to view USDA as *their* department and it's secretary *their* spokesman" (Nestle, 2002, Pg. 123). In part this relationship existed because farm states had lots of representation on the agricultural committees, and representatives often chaired these committees for decades at a time, building up power and reputation as they did. Although this relationship between the USDA and the food and farm industry does not exist in the same way today, it is important to understand the history behind their relationship in order to understand their relationship as it exists today.

One important question this research paper has set out to answer is whether or not there is a relationship between special interest groups (or lobbyists) and the USDA. Marion Nestle, author of *Food Politics*, found two different ways in which connections can be made between lobbyists and the USDA. The first is through donations and gifts from lobbyists, to USDA officials. "The animal food industry spends more than \$100 million yearly paying lobbyists and making strategic donations" (Simon, 2013, Pg. 42). As mentioned earlier, this is a common way

in which lobbyists operate both on, and off record. Data shows that in 2019 there were 1,806 lobbyists lobbying the USDA (*“Agency Profile: Dept of Agriculture”*, 2019). The groups responsible for hiring these lobbyists include Alliance for Meat, Poultry & Seafood Innovation, Memphis Meats, National Pork Producers Council, National Beef Packing, Agri Beef, National Cattlemen's Beef Association, New Mexico Cattle Growers Association, Texas Cattle Feeders Association, US Cattlemen’s Association, Ranchers-Cattlemen Action Legal Fund and more (*“Agency Profile: Dept of Agriculture”*, 2019). From this list, it is clear that there is a relationship between the animal food industry, lobbyists, and the USDA.

The second connection that can be made between lobbyists and the USDA is in the form of job exchanges also called “the revolving door” (Nestle, 2002). “The revolving door” is used to describe the common practice of “government regulators, Congressional staff and even members of Congress taking new jobs with lobbying firms and private sector organizations that, in many cases, they used to oversee” (*“Agency Profile: Dept of Agriculture”*, 2019). In 2019, there were 825 “revolvers” meaning people who moved from jobs in government, to private sector jobs, often lobbyists. This revolving door works in the opposite direction as well, meaning it is also common that former lobbyists become government employees and are often in charge of regulation of the lobbyists and organizations they used to work for or with. Historically, there have been many of these exchanges in which high ranking jobs at the USDA are given to former lobbyists or people from the meat industry, and vice versa. One prime example of this was “the appointment of a former president of the National Cattlemen’s Association, JoAnn Smith, as chief of the USDA’s Food Marketing and Inspection Division” (Nestle, 2002, Pg. 124) which happened in the early 1990’s and led to some of her decisions being called into question. The first decision that was questioned was that she “approved the euphemistic designation “fat-

reduced beef” for bits of meat that had been processes from otherwise unusable slaughtering by-products, and [second] she opposed an American Heart Association proposal to put a seal of approval on certain meat products that were low in fat” (Nestle, 2002, Pg. 125). These decisions were called into question because they seemed to put the interests of the meat/animal food industry first, instead of honoring her duty to consumers, and the responsibilities of her job at the USDA. While it does make sense that officials within the USDA should have extensive knowledge of the agricultural field, it can also lead to conflicts of interest, and a situation where the agency becomes, “completely dominated by the industry it was created to regulate” (Simon, 2013, Pg. 84).

When you look at all these smaller pieces, including checkoff programs, the historical relationship between the food industry and the USDA, the amount of lobbying of the USDA that takes place by the animal food industry, and the revolving door relationship between lobbyists and government employees (including USDA employees), it is clear that there is a certain amount of influence on, and conflicting interests within the USDA, especially when it comes to the animal food (meat) industry. As a result, there are a multitude of reputable people and organizations that dismiss the *Dietary Guidelines for American's*. For example, Dr. Walter Willett, chair of the Department of Nutrition at Harvard School of Public Health says, “the continued failure to highlight the need to cut back on red meat and limit most dairy products suggests that ‘Big Beef’ and ‘Big Dairy’ retain their strong influence within this department. Might it be time for the USDA to recuse itself because of conflicts of interest and get out of the business of dietary advice?” (*New U.S. Dietary Guidelines 2010: Progress, Not Perfection*, 2011). Dr. David Heber, founding director of the University of California, Los Angeles, Center for Human Nutrition said that the guidelines promote misinformation and will continue to

confuse the American public about what is, and is not healthy to consume (Heid, 2016). Dr. Robert Lustig, a pediatric endocrinologist at the University of California, San Francisco says “tasking the government agency that manages America’s food production with crafting nutrition policy is akin to ‘putting the fox in charge of the hen house’” (Heid, 2016). Clearly, many health and nutrition experts take a similar stance in regard to the *Dietary Guidelines for American’s and* view it as a document that is the product of animal food industry influence, and conflicting information in regards to health and healthy eating.

The Food Industry, Special Interest Groups, and HHS

HHS also plays a role in the formation and finalization of the *Dietary Guidelines for American’s*, and so it is important to address their relationship with the animal food industry and special interest groups as well. Although HHS is subject to a great deal of lobbying similar to the USDA, the quantity of animal food industry groups lobbying HSS is significantly lower than that of the USDA. While the USDA has a long list of lobbyists sponsored by those in the animal food industry (Alliance for Meat, Poultry & Seafood Innovation, Memphis Meats, National Pork Producers Council, National Beef Packing, Agri Beef, National Cattlemen's Beef Association, New Mexico Cattle Growers Association, Texas Cattle Feeders Association, US Cattlemen’s Association, Ranchers-Cattlemen Action Legal Fund and more) HSS has only two, North American Meat Institute and National Cattlemen’s Beef Association (“*Agency Profile: Dept of Agriculture*”, 2019, “*Agency Profile: Dept of Health and Human Services*”, 2019). Additionally, HSS is not involved in the checkoff programs mentioned previously and does not have the same conflicting goals that the USDA does. Because of these factors, many of the experts that criticize the USDA’s involvement in the formation and publication of the *Dietary Guidelines for*

American's believe that HSS should hold sole responsibility for the guidelines. The USDA's "inherent conflict of interest in nutritional matters led former US Senator Peter Fitzgerald (R-IL) to propose in 2003 that responsibility for nutritional advice should reside solely with HHS" (Simon, 2013, Pg. 79). Dr. Walter Willett, (chair of the Department of Nutrition at Harvard School of Public Health) says, "placing the guidelines solely in the hands of the Department of Health and Human Services would be a step in the right direction" (Heid, 2016). With all this information the question becomes, why *doesn't* HHS hold sole responsibility?

As it turns out, historically there has been conflict over who should hold the responsibility of overseeing the nutritional guidelines and recommendations. In the 1970's, "Congress was under pressure to support health promotion as a means to reduce costs of health care" (Nestle, 2002, Pg. 77). Because of this, they needed to put an agency in charge of health and nutrition promotion, which is where the conflict between the USDA and HSS (then Department of Health, Education and Welfare (DHEW)) began. The USDA wanted to have control over nutrition promotion, while the DHEW felt that as a health agency rather than an agricultural agency, it was more in their wheelhouse. However, due to the influence of "Senator Hubert Humphrey (Dem-MN) [who] said that 'HEW has avoided the area of prevention like the plague, and it's about time the USDA moves in'" (Nestle, 2002, Pg. 77), the USDA was granted the primary responsibility for nutrition promotion, which they shared to certain degree with DHEW. Many years later, the House Appropriations Committee reestablished the USDA's responsibility over nutrition promotion citing their goal as, "consistent dietary advice" coming from "one voice", "'consistency' in this case meant advice favorable to agriculture" (Nestle, 2002, Pg. 78). Nestle writes that the goal of the House Appropriations Committee was to prevent HSS from "issuing independent dietary advice that might adversely affect agricultural interests"

(Nestle, 2002, Pg. 78). It is clear that HSS is not impacted by the animal food industry in the same way the USDA is, and that HSS is not afflicted with the same conflicting interests that the USDA is due to their role in the agricultural industry, as well as the health promotion industry. From this, it seems as though HSS is not as responsible for the absence of an explicit recommendation against red meat consumption in the published *Dietary Guidelines for Americans* as is the USDA.

Health Implications of Red Meat Consumption

Another question this paper set out to answer was whether or not the lack of a recommendation against red meat consumption in the *Dietary Guidelines for Americans* has negatively impacted the health of the American public. While it is hard to cite a causal relationship between the health outcomes of Americans, and the lack of a recommendation against red meat consumption, there is plenty of evidence to demonstrate that there are significant health implications as a result of red meat consumption, and that the *Dietary Guidelines for Americans* do not do their part to dissuade Americans from consuming red meat.

Consumption of red meat has been linked to a plethora of health conditions by numerous different academic studies. For example, Rouhani et al. found that consuming high amounts of red and processed meat is directly associated with obesity and high BMI (Rouhani et al., 2014). A study done by Harvard School of Public Health found that even eating “just one daily serving of red or processed meat was associated with up to a 35 percent higher risk of type 2 diabetes” (Pan et al., 2011). Another study found low intake of red and processed meat to be associated with higher cardiovascular disease (CVD) mortality (Alshahrani et al., 2019). Sinha et al. found consumption of red and processed meats to be associated with higher overall mortality, as well as

cardiovascular mortality, and cancer mortality (Sinha et al., 2009). A study done by Kontogianni et al. found that consumption of red meat was associated with a 52% increase in the odds of having acute coronary syndrome (ACS) (Kontogianni et al., 2007). ACS is “a term used to describe a range of conditions associated with sudden, reduced blood flow to the heart” (“*Acute Coronary Syndrome*”, 2020), including heart attack.

These studies and many more clearly demonstrate that consumption of red meat is associated with health conditions including but not limited to obesity, high BMI, type 2 diabetes, CVD mortality, overall mortality, cancer mortality, and ACS (Rouhani et al., 2014, Pan et al., 2011, Alshahrani et al., 2019, Sinha et al., 2009, Kontogianni et al., 2007). Despite this overwhelming evidence that has been presented in respected journals including *European Journal of Clinical Nutrition*, *American Journal of Clinical Nutrition*, *Archives Of Internal Medicine*, *Obesity Reviews*, and *Nutrients*, the *Dietary Guidelines for Americans* does not explicitly recommend that Americans limit red meat consumption. As mentioned previously in this paper, the guidelines write that the foods that should be limited include, “saturated fats and *trans* fats, added sugars, and sodium (US Department of Health and Human Services/Department of Agriculture, 2015, Pg, 15). Red meat is not explicitly mentioned in the list of foods that should be limited. Additionally, the guidelines list meat as a healthy food, and suggest consuming 26 oz a week of meat, poultry, and eggs (US Department of Health and Human Services/Department of Agriculture, 2015, Pg, 25). Although the information presented is not enough to definitively conclude that an association exists between the lack of a recommendation against red meat consumption in the *Dietary Guidelines for Americans* and negative health outcomes, it does suggest that a relationship could exist.

Healthcare Costs

As mentioned above, red meat consumption is associated with numerous health conditions, and health issues including obesity, high BMI, type 2 diabetes, CVD mortality, overall mortality, cancer mortality, and ACS (Rouhani et al., 2014, Pan et al., 2011, Alshahrani et al., 2019, Sinha et al., 2009, Kontogianni et al., 2007). These health conditions that stem from red meat consumption, lead to significant healthcare costs, and lost productivity (Springmann et al., 2018, Simon, 2013). Globally, dietary risks account for 22% of all deaths among adults (11 million deaths), with CVD as the leading cause of diet-related deaths (10 million deaths) (GBD 2017 Diet Collaborators, 2019). Diet-related cancer accounts for 913,090 deaths globally, and diet-related type 2 diabetes accounts for 338,714 deaths (GBD 2017 Diet Collaborators, 2019). These diet-related deaths contribute significantly to healthcare costs and lost productivity. Although these numbers are global, and do not solely represent diet-related deaths in the US, the US does suffer from high rates of CVD, cancer, and type 2 diabetes at large cost. The American Heart Association reports that the current healthcare costs associated with CVD are \$318 billion with an additional \$237 billion in lost productivity, for a whopping total of \$555 billion annually (American Heart Association, 2017). The Cancer Atlas estimates that the healthcare costs associated with cancer were \$161 billion in 2017, with an additional \$30 billion in lost productivity (The Cancer Atlas, 2020). Finally, the American Diabetes Association reports that the healthcare costs due to diabetes care was \$176 billion, with an additional \$69 billion in lost productivity in 2012 (Yang et al, 2013). Of these billions of dollars in costs associated with CVD, cancer, and type 2 diabetes, a portion is due to diet related CVD, cancer and type 2 diabetes. Springmann et al. estimates that “the health-related costs to society attributable to red and processed meat consumption in 2020 amounted to USD 285 billion” (Springmann et al.,

2018, Pg. 1). These findings show that American's consumption of red meat leads to billions of dollars in healthcare costs, and lost productivity each year.

Discussion

This paper aimed to examine the relationships between special interest groups and both the USDA and HHS, and the impact these relationships have on the recommendations presented in the *Dietary Guidelines for Americans*. A relationship was found between special interest groups/meat lobbyists and the USDA. In 2019 there were 1,806 lobbyists lobbying the USDA ("Agency Profile: Dept of Agriculture", 2019), including a large number of lobbyists hired by the meat industry. Additionally, the "the revolving door" phenomenon, which describes the common practice of job switching between government employees and lobbyists (Nestle, 2002) also adds to the evidence of a relationship between the two groups. When researched further, it was found that the USDA operates under conflicting goals because it oversees checkoff programs which promote and subsidize certain agricultural products including red meat, while also being tasked with writing nutritional guidelines which will inherently impact the consumption of these products being promoted. These findings are important because the USDA holds a majority of the power over what is presented in the *Dietary Guidelines for Americans*, and what is not, and it is not clear where, or to whom their primary responsibility lies.

A relationship was not found between special interest groups/meat lobbyists and HHS. HHS is not lobbied significantly by those in the meat industry and is also not involved in overseeing checkoff programs as the USDA is. HHS's primary goal is health promotion, and because of this, many experts have said that HHS should solely be in charge of producing the *Dietary Guidelines for Americans*. This is important because currently, HHS has less power over

the contents of the *Dietary Guidelines for Americans* due to the House Appropriations Committee delegating the power primarily to the USDA. This is thought to be so that the interests of the agricultural industry are not negatively affected by the content of the *Dietary Guidelines for Americans*.

Research did find a lack of an explicit recommendation against eating meat in the *Dietary Guidelines for Americans*, despite such a recommendation being present in the Scientific Report of the 2015 Dietary Guidelines Advisory Committee, and despite there being significant research available demonstrating the negative health impacts the consumption of red meat is linked to. Although conclusive evidence was not found that the lack of such recommendation against red meat consumption was a cause of poor American health, evidence was found that red meat consumption leads to numerous negative health outcomes. These negative health outcomes were found to cost billions annually in healthcare costs, and lost productivity. These results are important because the data shows that recommending that Americans consume less red meat could cut down significantly on healthcare costs and could improve the overall health of the American people.

Conclusion

The US government first started providing nutritional advice to the public with the goal of lowering rising healthcare costs (Nestle, 2002), however as time went on, it seems as though this goal was overhauled by the USDA's desire to promote and maintain the agricultural industry and their interests. The USDA is primarily in charge of creating the *Dietary Guidelines for Americans*, yet the goals and interests of the agency are inherently in conflict. Contrastingly, HHS, an agency solely focused on promoting and enhancing the health of American's, has less

control over the guidelines. This has led many health and nutrition experts to question the validity of the guidelines, as well as the interests of its creators.

This study is important because the United States is ranked as the 35th healthiest country in the world, despite being one of the richest and most highly developed (Miller & Lu, 2019). The health of Americans is suffering, and healthcare costs attributable to diet-related diseases are only rising. It is important that the government take further action to help prevent diet-related disease. One such action could be writing the next version of the *Dietary Guidelines for Americans* (2020-2025) based solely on scientific evidence (and not agricultural interests), including a recommendation against the consumption of red meat, or least limiting it. For this to happen, the responsibility of writing publishing the guidelines may need to be taken away from the USDA and given solely to HSS.

One limitation of this study was that a significant portion of lobbying is done behind closed doors and is not reported. Personal gifts and favors are often not recorded, meaning it is difficult to know the true extent of lobbying influence on any government official or agency. Because of this, the extent of lobbying influence on the USDA and HSS as reported in this paper could be underestimated.

Future research should gather data on the number of American's who read the *Dietary Guidelines for Americans*, in order to better be able to study its level of influence on American's eating habits. This study was not able to definitely conclude that the lack of a recommendation against consuming red meat was a cause of poor American health because of the lack of existing data showing this level of influence.

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